

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.

Hand Delivered

March 29, 2000

Ms. Patricia Moe
Reregistration Branch (H7508C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Crystal Mall 2, Room 675
1921 Jefferson Davis Highway
Arlington, VA 22202

Re: Comments on EPA's Risk Assessments for Malathion

Dear Ms. Moe:

This letter is submitted on behalf of Cheminova A/S (Cheminova, EPA Company No. 4787) and is in response to your letter to Paul Whatling of Jellinek, Schwartz & Connolly, Inc. (JSC), dated February 17, 2000, regarding malathion. Please note that JSC received the letter via certified mail on February 28, 2000.

This submission provides Cheminova's initial comments on the Agency's draft preliminary risk assessments for malathion. At this time, Cheminova is submitting 3 copies each of the following items:

- A document entitled "Comments from Cheminova A/S on EPA's Draft Preliminary Risk Assessments for Malathion";
- A report entitled "Mortality and Incidence of Cancer Among Employees at Cheminova Agro"; and
- A report entitled "AC 6,601: A 28-Day Oral Toxicity Study in Beagle Dogs".

EPA requested that Cheminova provide comments only on errors (defined by EPA as typographic, computational, mathematical, or other similar errors) and we have identified

errors in the first section of our comments. However, Cheminova believes that there are some significant problems with EPA's draft preliminary risk assessments and thus we have provided a more detailed and comprehensive response. Cheminova believes many of these issues are important such that EPA must consider and act on all of these comments before issuing the malathion preliminary risk assessments for public comment.

As requested, Cheminova has reviewed the enclosed documents for Confidential Business Information (CBI) and has determined that nothing in these documents is considered to be CBI.

Cheminova recognizes that EPA will eventually provide these items to the FIFRA Docket. Cheminova understands the FIFRA Docket classifies documents as follows:

Code	Classification Explanation
A	Any document fully releasable to the general public, including publication of the item on the internet.
B	A study submitted to satisfy FIFRA requirements, which may be released to a person other than the study's owner upon the Agency's receipt of a Freedom of Information Act (FOIA) request and affirmation of a non-multinational status. Documents classified this way will not be published by EPA on the internet.
C	Any document considered confidential, which may not be released unless its owner agrees to its release after a FOIA request has been made and forwarded to the owner for consideration. If the owner's reply to the Agency during the stated response period provides a rationale against the release of the document, the Agency's Office of General Counsel (OGC) would determine if such a document may be released. We understand OGC's decisions may be challenged by the document's owner through appropriate channels. Documents classified this way will not be published by EPA on the internet.

Cheminova has determined that the items included in this submission should be coded for the FIFRA Docket as follows:

- A document entitled "Comments from Cheminova A/S on EPA's Draft Preliminary Risk Assessments for Malathion" Code A
- A report entitled "Mortality and Incidence of Cancer Among Employees at Cheminova Agro" Code B
- A report entitled "AC 6,601: A 28-Day Oral Toxicity Study in Beagle Dogs" Code B.

If you have any questions about the information provided in this submission, please do not hesitate to call me at (703) 312-8520.

Sincerely,

Diane Allemang
Jellinek, Schwartz & Connolly, Inc.
Authorized Representative of
Cheminova A/S

Enclosures

c: David Menotti, Shaw Pittman
Don O'Shaughnessy, Cheminova Inc.
Jon Weis, Cheminova A/S